

**MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN**

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June 10, 2005

The Honorable Kent A. Jordan  
U.S. District Court  
844 N. King Street  
Lock Box 10  
Wilmington, DE 19801

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Re: **Gorbey, et al. v. Longwill, et al.**  
**U.S.D.C. – District of Delaware, C.A. No. 05-211 KAJ**  
**Our File No.: 03030.02632**

Dear Judge Jordan:

In conjunction with the telephone scheduling conference to be held with Your Honor on Monday, June 13, 2005 at 3:30 p.m., counsel have conferred and propose the following discovery schedule for inclusion in the Scheduling Order:

- (2) Joinder of Other Parties and Amendment of Pleadings – September 30, 2005;
- (3) Discovery
  - (a) Limitation on Hours for Deposition Discovery – 100 per side;
  - (c) Discovery Cut Off – March 31, 2006;
  - (d) Disclosure of Expert Testimony – plaintiff shall file his initial Federal Rule of Civil Procedure 26(a)(2) disclosure of expert testimony on or before January 9, 2006. Defendants shall file their initial Federal Rule of Civil Procedure 26(a)(2) disclosure of expert testimony on or before February 20, 2006.

On behalf of the parties and their counsel, I thank Your Honor for consideration of this matter.

Very truly yours,

  
Kevin J. Connors

KJC/ps

cc: Clerk of the Court  
All Counsel